

Stolt-Nielsen USA Inc.



A subsidiary of
Stolt-Nielsen Limited

Stolt Tankers and Terminals
800 Connecticut Avenue
4th Floor East
Norwalk, Connecticut 06854
U.S.A.

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BY FEDEX

September 16, 2011

Mr. Kevin Shade, Enforcement Officer
Superfund Enforcement Assessment Section (6SF-TE)
U.S. EPA, Region 6
1445 Ross Avenue
Dallas, Texas 75202-2733

RECEIVED
11 SEP 19 PM 2:53
SUPERFUND DIV.
DIRECTOR'S OFC.

GULFCO MARINE MAINTENANCE SUPER FUND SITE RESPONSE TO INFORMATION REQUEST

Dear Sirs:

We attach our response to the GulfCo Marine Maintenance Superfund Information Request.

Very truly yours,

Daniel Carr
Assistant General Counsel

Enclosure



641542

Enclosure 3

**GULFCO MARINE MAINTENANCE SUPERFUND SITE
INFORMATION REQUEST**

QUESTIONS

General Information Concerning Respondent

1. Provide the full legal name and mailing address of the Respondent.

Stolt-Nielsen USA Inc. Mailing address: 800 Connecticut Avenue 4th Floor East Norwalk, Connecticut 06854	Office address: 15365 Jacintoport Blvd. Houston, Texas 77015
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2. Identify and provide full name, title, business address, and business telephone number for each person answering these questions on behalf of the Respondent, and each person(s) that was relied on or consulted with in the preparation of the answer.

Daniel Carr, Assistant General Counsel
Ray Kelly, General Manager, Barging
3. If Respondent wishes to designate an individual for all further correspondence concerning this Site, including legal notices, please provide the individual's name, address, and telephone number.

Daniel Carr, Stolt-Nielsen USA Inc., 800 Connecticut Avenue, 4th Floor East, Norwalk, Connecticut 06854, d.carr@stolt.com, Tel: 203-299-3795

Specific Information relating to Site Operations

4. Identify and include a brief description of the nature, timeframe(s) and status of the Respondent's business relationships with Gulfco Inc., Gulfco Marine Maintenance, Inc., Fish Engineering and Construction Inc., Hercules Marine Services Corporation, LDL Coastal Limited L.P., LDL Management LLC, and any other previous or current owner or operator of the Site.

The Respondent's records indicate that it only had a business relationship with Hercules Marine Services Corporation ("HMSC"). During the relevant period the Respondent operated and chartered a certain number of barges from Maryland Marine Inc., and as part of its obligation under the charter, the Respondent had responsibility for the maintenance of the barges.

The Respondent's records indicate that it hired HMSC on three (3) separate occasions to provide cleaning services. See attached records.

5. Identify all transactions with the Site owners and/or operators of the Site that resulted in materials being sent to the Site by you for any purpose, including but not limited to barge cleaning. Identify and provide all documents related to each transaction, including but not limited to invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:

- a. The type and purpose for the transaction;

|In 1992, Stolt's records (as attached) indicate that Stolt hired HMSC to perform cleaning services. HMSC charged Stolt \$2,360.25 for such services.

In 1995, Stolt's records (as attached) indicate that Stolt hired HMSC to perform cleaning services under two (2) separate transactions (for cleaning of Phillips Petrol invoiced at \$1,800 and for cleaning Formosa Plastic invoiced at \$19,435.63. Any additional information is not available. |

- b. A description of the materials involved, including their quantity and chemical content and characteristics;

|See response to 5a.|

- c. Any amounts paid by you in connection with each transaction;

|See response to 5a.|

- d. The date of each transaction; and

|See response to 5a.|

- e. The date the materials were sent to the Site

|See response to 5a.|

6. Identify all persons, including the Respondent, who may have arranged for disposal or treatment or arranged for transportation for disposal or treatment of materials, hazardous materials, hazardous substances, and/or hazardous wastes (materials) from various facilities to the Site. This information shall identify and state, but not be limited to the following:

- a. The persons with whom the Respondent made such arrangements;

|Not available|

- b. The precise locations from which these materials originated;

|Not available|

- c. The nature, including the chemical content, characteristics, physical state (e.g., solid or liquid) and quantity (e.g., volume or weight) of all materials involved in each such arrangement;

|Not available|

- d. All tests, analyses, analytical results, and manifests concerning each material involved in such transactions;

|Not available|

- e. The persons who selected the location to which the materials were to be disposed and/or treated. In particular, the persons who selected the Site as a location for disposal and/or treatment of the materials. This information shall include where these persons intended to have the materials involved in each arrangement treated or disposed and all evidence of their intent;

|Not available|

- f. The amount paid in connection with each such arrangement, the method of payment, and the identity of the persons involved in each payment transaction; and

|See response to 5a. Otherwise, any additional information is not available.|

- g. Provide contracts or other documents reflecting such arrangements for transportation, disposal, and/or treatment of materials.

|See response to 6f. |

- 7. Identify the corporate relationship(s) (such as successor by name change, successor by merger, etc.) between the named recipient of this request and its related entities as named at the time materials were sent by Respondent to the Site. Provide the corporate records which document the corporation relationship(s), including but not limited to documents related to mergers, acquisitions, sales, and assignments of liability.

|Successor in interest.|

- 8. List all federal, state, and local permits, identification numbers, and/or registrations issued to the Respondent's operation for the storage, transport, and/or disposal of materials. Include respective permit numbers

|Not available.|

- 9. Provide names and address for all carriers who transported materials on behalf of Respondent to hazardous waste treatment, storage, or disposal facilities permitted by EPA or the State.

|Not available.|

10. Identify whether a Notification of Hazardous Waste Activity was ever filed with EPA or the corresponding agency or official of the State. This information shall include, but not be limited to the following:

a. The date of such filing;

|Not available. |

b. The wastes described in such notice;

|Not available. |

c. The quantity of the wastes described in such notice; and

|Not available. |

d. The identification number assigned to such facility by EPA or the State.

|Not available. |

11. Identify all federal, state, and local offices and agencies to which the Respondent has sent or filed hazardous substance or hazardous waste information and state the years during which such information was sent or filed.

|Not available. |

(5c)

Date 7/27/11

General Ledger Account Inquiry
General Ledger Reference

Time 20:02:20

Reference	Date	Source doc	App	Yr	Pd	Qtr	Audit Opr	Aud Date
9474356	6/16/95		AP	95	07	0	DLV	6/16/95

Description
1 HERCULES

(2)

JOB #	ACT.SUB	Debit	Credit	Quantity /Project
1 B950348	508.1	19,435.63		
FORMOSA PLASTIC	CLEANING EXPENS			
2 0	220		19,435.63-	
ADMINISTRATION	A/P - RAIL VEND			

CMD 02 - Return to initial prompt screen

(5c)

Date 7/27/11

General Ledger Account Inquiry
General Ledger Reference

Time 20:02:20

Reference	Date	Source doc	App	Yr	Pd	Qtr	Audit Opr	Aud Date
9486378	7/25/95		AP	95	08	0	DLV	7/25/95

Description
1 HERCULES

JOB #	ACT.SUB	Debit	Credit	Quantity /Project
1 B950506	508.1	1,800.00		
PHILLIPS PETROL CLEANING EXPENS				
2 0	220		1,800.00-	
ADMINISTRATION A/P - RAIL VEND				

CMD 02 - Return to initial prompt screen

(5a)

Date 7/27/11

General Ledger Account Inquiry
General Ledger Reference

Time 20:02:20

Reference	Date	Source doc	App	Yr	Pd	Qtr	Audit Opr	Aud Date
9097444	6/08/92		AP	92	07	0	CCL	6/08/92

Description
1 HERCULES

JOB #	ACT.SUB	Debit	Credit	Quantity /Project
1 P920096	508.4	2,360.25		
STJS	STJS - CLEANING			
2 0	220		2,360.25-	
ADMINISTRATION	A/P - RAIL VEND			

CMD 02 - Return to initial prompt screen

(5a)

Date 7/27/11

Review Transactions by Vendor

Time 19:49:26

Vendor HERC HERCULES
INACTIVE 11011 RICHMOND STE 500
HOUSTON TX 77042

Beg Date
End Date

Due Date	Invoice/Check	Inv/Chk Date	Gross Amount	Previous Payments	Discnt	Net Due
70392	1775-92	60392	2360.25-			
Vdr HERC	Bill			Rec		Ref 9097444
	10775	62492		2360.25		
Vdr HERC	Bill			Rec		Ref 9097444
70895	2981-95	60895	19435.63-			
Vdr HERC	Bill			Rec		Ref 9474356 ←
	17890	61695		19435.63		
Vdr HERC	Bill			Rec		Ref 9474356
73095	3011-95	63095	1800.00-			
Vdr HERC	Bill			Rec		Ref 9486378
	18070	72595		1800.00		
Vdr HERC	Bill			Rec		Ref 9486378
	Balance		23595.88-	23595.88		

CMD 2 - Review Next Vendor

CMD 3 - Fold/Truncate